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Attorneys for Defendants Bank of America National Association as Successor Trustee by merger to LaSalle Bank National Association as Trustee under the Pooling and Servicing Agreement dated as of August 1, 2006, GSAMP Trust 2006-HE5; and Litton Loan Servicing LP.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
(PORTLAND DIVISION)

NATACHE D. RINEGARD-GUIRMA,

No. 3:10-cv-01065-PK

Plaintiff,

v.

UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE A
RESPONSE TO THE SECOND
AMENDED COMPLAINT (BY ALL
DEFENDANTS)

BANK OF AMERICA NATIONAL
ASSOCIATION as Successor Trustee By
Merger To LaSalle Bank National Association
As Trustee Under The Pooling and Servicing
Agreement Dated As Of August 1, 2006,
GSAMP Trust 2006-HE5; MERS; LITTON
LOAN SERVICING LP; LSI TITLE
COMPANY OF OREGON LLC; and QUALITY
LOAN SERVICING CORPORATION OF
WASHINGTON,

Defendants.

I. LR 7.1 Statement

Undersigned counsel confirm that they have conferred with counsel for Plaintiff,
David Koen, and that Mr. Koen has no objection to this Motion.

II. Motion

Plaintiff, Natache D. Rinegard-Guirma, with leave of the court, filed her Second

Amended Complaint in this matter on October 7, 2010 (#40). Pursuant to the Federal Rules of Civil Procedure, Defendants' responsive motion or pleading to the Second Amended Complaint is due to be filed October 27, 2010. However, after Plaintiff filed her Second Amended Complaint, she secured the assistance of counsel, David Koen, who filed a notice of appearance on October 19, 2010 (#44). Mr. Koen would like to perform additional research and intends to submit a motion for leave to file a third amended complaint by November 18, 2010. Defendants are in principle not opposed to such motion and amendment. Furthermore, defendants anticipate that the court will grant Plaintiff leave to amend now that she is represented by counsel.

Should the court deny Plaintiff's anticipated motion to amend for whatever reason, Defendants seek an extension of time to file their response to the Second Amended Complaint to thirty days from the date that the court denies Plaintiff's motion. Should Plaintiff not file a motion requesting leave to amend the complaint before December 31, 2010, Defendants request that they be allowed until January 31, 2011 to file a responsive motion or pleading to the Second Amended Complaint.

Dated this 27th day of October, 2010.

ROUTH CRABTREE OLSEN, P.C.

By: /s/ Ian Kyle

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